

#4

15BE/KCC

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Name and address of Plaintiff:

WILLIAM HARRIS CX7039  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PENNA., 15450-0999

v.

Full name, title, and business address  
of each defendant in this action:

1 (FIRST NAME UNK.) POSKA, SERGEANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PENNA., 15450-0999

2 C. PARKER, LIEUTENANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PENNA., 15450-0999

Use additional sheets, if necessary  
Number each defendant.

RECEIVED

NOV 18 2015

CLERK, U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

15-1493

Plaintiff brings this action against the above named and identified defendants on the following cause of action:

I. Where are you now confined? SCI FAYETTE, LABELLE, PA.

What sentence are you serving? LIFE

What court imposed the sentence? PHILADELPHIA COURT OF COMMON PLEAS

II. Previous Lawsuits

A. Describe any and all lawsuits in which you are a plaintiff which deal with the same facts involved in this action. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs \_\_\_\_\_

Defendants \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) and docket number  
\_\_\_\_\_

3 BRIAN V. COLEMAN, SUPERINTENDENT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PENNA., 15450-0999

4 SCOTT NICKELSON, ACTING SUPT.  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

5 RHONDA A. HOUSE, GRIEVANCE COORD.  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

6 (FIRST NAME UNK.) WALKER, CAPTAIN  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

7 STEVE BUZAS, RHU UNIT MANAGER  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

8 J.M. SKROBACZ, CORRECTION OFFICER  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

9 (FIRST NAME UNK.) ROHAL, LIEUTENANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

10 D.D. SMITH, CORRECTION OFFICER  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

11 STEVEN M. GATES, DEPUTY SUPT.  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

12 ERIC T. ARMEL, DEPUTY SUPT.  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

13 (FIRST NAME UNK.) BURTON, LIEUTENANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

14 (FIRST NAME UNK.) SWITZER, LIEUTENANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PENNA., 15450-0999

15 (FIRST NAME UNK.) ROBERTS, OFFICER<sup>CORRECTIONS</sup>  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

16 (FIRST NAME UNK.) DOBISH, SERGEANT  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

17 (FIRST NAME UNK.) WENTZEL, OFFICER<sup>CORRECTIONS</sup>  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

18 SUSAN BERRIER, CORRECTIONAL HEALTH  
CARE ADMINISTRATOR  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

19 ALICE MAKSIK, NURSE PRACTITIONER  
SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

20 DORINA VARNER, CHIEF GRIEVANCE OFFICER  
PA. DEPT. OF CORR. 1920 TECHNOLOGY PKWY  
MECHANICSBURG, PA., 17050

21 TREVOR WINGARD, SUPERINTENDENT  
SCI SOMERSET 1600 WALTERS MILL ROAD  
SOMERSET, PA., 15510

22 (FIRST NAME UNK.) WADSWORTH, MAJOR  
SCI SOMERSET 1600 WALTERS MILL RD.  
SOMERSET, PA., 15510

3. Name of judge to whom case was assigned \_\_\_\_\_
4. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

5. Approximate date of filing lawsuit \_\_\_\_\_

6. Approximate date of disposition \_\_\_\_\_

- B. Prior disciplinary proceedings which deal with the same facts involved in this action:

Where? \_\_\_\_\_

When? \_\_\_\_\_

Result: \_\_\_\_\_

- III. What federal law do you claim was violated? OFFICIAL OPPRESSION, BIGOTRY, RACIAL DIS-

- CRIMINATION, DELIBERATE INDIFFERENCE TO MEDICAL NEED, USURPATION, RETALIATION, ETHNIC INTIMIDATION, DUE PROCESS OF LAW, CRUEL AND UNUSUAL PUNISHMENT, EQUAL PROTECTION/TREATMENT, AND HINDERING PROSECUTION, AND RETALIATORY TRANSFER.
- IV. Statement of Claim

(State here as briefly as possible the facts of your case. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.)

- A. Date of event: INITIAL DATE 17 MARCH 2015 WITH NUMEROUS SUBSEQUENT DATES AND EVENTS.

- B. Place of event: SCI FAYETTE

- C. Persons involved--name each person and tell what that person did to you: THERE ARE 22 DEFENDANTS NAMED IN THIS CIVIL ACTION IN ACCOMPANYING DOCUMENTS OF COMPLAINTS, DETAILING WHAT EACH PERSON DID TO ME.

- V. Did the incident of which you complain occur in an institution or place of custody in this District?  
If so, where?

SCI FAYETTE 50 OVERLOOK DRIVE  
LABELLE, PA., 15450-0999

and answer the following questions:

- A. Is there a prisoner grievance procedure in this institution?  
Yes ☒ No ☐
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?  
Yes ☒ No ☐
- C. If your answer is YES,
1. What steps did you take? FILED GRIEVANCES COMPLETELY THROUGH THE GRIEVANCE PROCEDURE AND EXHAUSTED ADMINISTRATIVE REMEDIES PER 42 U.S.C.A. § 1997e (a)
  2. What was the result? PENNA. DEPT. OF CORRECTIONS REFUSED TO ACCEPT RESPONSIBILITIES FOR CIVIL RIGHTS VIOLATIONS CLAIMED.
- D. If your answer is NO, explain why not: \_\_\_\_\_
- E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?  
Yes ☐ No ☐
- F. If your answer is YES,
1. What steps did you take? \_\_\_\_\_
  2. What was the result? \_\_\_\_\_

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I RESPECTFULLY PRAY THAT THIS COURT ENTER JUDGMENT GRANTING PLAINTIFF A DECLARATION THAT THE UNLAWFUL ACTS DESCRIBED HEREIN VIOLATED PLAINTIFF'S CIVIL RIGHTS; A GREGATIVE SUM OF \$110,000<sup>00</sup> IN COMPENSATORY DAMAGES AND \$250,000<sup>00</sup> IN PUNITIVE DAMAGES; A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY; PLAINTIFF'S COSTS IN THIS SUIT AND ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST, PROPER, AND EQUITABLE.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

9 November 2015 William Harris CX 7039  
(Date) (Signature of Plaintiff) PRO SE

(A.) CHRONICLE OF EVENTS - SCI SOMERSET

(1) ON 6 MARCH 2015 AT 9:05 AM, WHILE HOUSED IN SCI SOMERSET'S RESTRICTED HOUSING UNIT (RHU) ON ADMINISTRATIVE SEGREGATION (ADM SEG) STATUS, FROM MY CELL I CALLED OUT TO MAJOR WADSWORTH TO INFORM HIM THAT AN OFFICER (OFC) WAS UNLAWFULLY WITHHOLDING MY LEGAL PAPERS. AFTER THIS DISCUSSION AS MAJOR WADSWORTH STARTED TO LEAVE HE SAID: QUOTE "BY THE WAY, YOU'LL BE LEAVING US SOMETIME NEXT WEEK. WE'RE SWAPPING YOU FOR AN INMATE AT FAYETTE (SCI)". UNQUOTE. I ASK: "WHY ARE YOU SENDING ME BACK TO THE PRISON I HAD PROBLEMS WITH THE STAFF AND GOT SHIPPED OUT OF FOR FILING A LAWSUIT?" MAJOR WADSWORTH REPLIES: QUOTE "YOU'LL FIND OUT WHEN YOU GET THERE. DEPUTY SUPERINTENDENT GATES SAYS THAT HE REMEMBERS YOU." END QUOTE

(2) ON 14 MARCH 2015 OFFICERS DROBNICH AND BORING ESCORT ME TO PROPERTY ROOM IN ORDER TO INVENTORY AND PACK MY PROPERTY FOR THE IMPENDING TRANSFER TO SCI FAYETTE. EVERY ITEM IS EXAMINED BY OFFICER BORING, WHO THEN TELLS OFC. DROBNICH TO MARK ON THE 'INMATE PERSONAL PROPERTY INVENTORY' FORM DC-153M THE QUANTITY OF EACH INSPECTED ITEM THAT IS APPROVED FOR SHIPPING WITH THE LETTER 'S' PLACED IN THE COLUMN 'METH' (METHOD OF DISPOSITION). THE DC-153M FOR TRANSFER WAS SIGNED BY OFC. DROBNICH AND ME IN THE LOWER LEFT BOX, DATED 3-14-2015 DENOTING "THE PROPERTY DESCRIBED ABOVE WAS INVENTORIED AND PROCESSED AS INDICATED."

(3) THE FOREGOING TWO PARAGRAPHS BEAR SIGNIFICANT RELEVANCY TO THE COMPLAINT OF WHICH THIS CIVIL ACTION IS FILED. THE ABOVEMENTIONED EVENTS APPEAR INNOCUOUS ON THE SURFACE, BUT WITH THE FOLLOWING COMPLAINT, REplete WITH EVIDENTIARY SUPPORT ACCOMPANYING THE COMPLAINT, AND MORE SUPPLIED THROUGH DISCOVERY & PRODUCTION OF DOCUMENTS, EACH OF THESE EVENTS ARE CORRELATIVE TO THE RETALIATORY MISTREATMENT I WAS SUBJECTED TO AT SCI FAYETTE.

(A2) COMPLAINT : CHRONICLE OF EVENTS AT SCI FAYETTE

(1) ON 17 MARCH 2015 I WAS TRANSFERRED BACK TO SCI FAYETTE AND PLACED IN ADM SEG BY LIEUTENANT STALEY. (ACCOMPANYING EXHIBIT ). I WAS ESCORTED TO "L BLOCK B POD" BY RHU SERGEANT AND ONE OFFICER (UNKNOWN). WHILE ENTERING B POD THE OFFICER ASKED SGT. POSKA : QUOTE "PUTTIN' HIM IN TWO?" (IN REFERENCE TO CELL LB-1002 ON THE LOWER LEVEL) END QUOTE. SGT. POSKA SAYS : QUOTE "NO, I'M PUTTING HIM IN 22 CELL." END QUOTE. SGT. POSKA DIRECTED ME TO THE STAIRCASE WHILE THE OFFICER LEFT THE POD. AFTER REACHING CELL LB-2022 I IMMEDIATELY SEE THE IRREPARABLY DAMAGED BEDFRAME THATS BEEN INTENTIONALLY BENT INTO A HAMMOCKED SHAPE. I EXPLAIN TO SGT. POSKA THAT I HAVE MEDICAL ISSUES THAT PRECLUDE ME FROM SLEEPING ON A BENT BEDFRAME SUCH AS A SURGICALLY REBUILT RIGHT HIP AND FORE-ARM, DAMAGED KNEES, AND VERTIGO. SGT. POSKA SAID : QUOTE "YOU'LL BE IN HERE A COUPLE OF DAYS. I'M NOT MOVING YOU." END QUOTE. AFTER I WAS LOCKED IN THE CELL BY SGT. POSKA I IMMEDIATELY KEPT PRESSING THE INTERCOM BUTTON TO TALK TO A "WHITE SHIRT" (OFFICER ABOVE THE RANK OF SGT.). I HAD, VIA INTERCOM, REPEATED DIALOGUE WITH THE OFFICER MANNING THE CONTROL BOOTH LATER IDENTIFIED AS OFC. HOLMAN WHO AFTER HEARING MY COMPLAINTS ABOUT THE BEDFRAME REPLIED VIA INTERCOM : QUOTE "MAN, YOU GOT A LOT OF MEDICAL ISSUES. I'LL PASS IT ON TO THE LIEUTENANT." END QUOTE. NO LIEUTENANT APPEARED UNTIL LATER.

(2) ON 17 MARCH 2015 AT 8:04 PM A NURSE, SGT. POSKA, RHU LT. C. PARKER AND TWO OFFICERS CAME TO CELL LB-2022 BECAUSE OF MY COMPLAINTS OF VERTIGO AND MIGRAINE WHICH I INITIALLY COMPLAINED ABOUT TO THE TRANSPORTING SGT. DURING THE TRANSFER STOPOVER EARLIER THAT AFTERNOON AT SCI BRENNER AND TO THE MALE NURSE IN SCI FAYETTE'S RECEIVING ROOM UPON ARRIVAL. THE CELL DOOR WAS NOW WIDE OPEN, THE BENT BEDFRAME WAS IN PLAIN VIEW TO LT. C. PARKER AND I

ASKED LT. C. PARKER TO MOVE ME TO ANOTHER CELL AND LT. C. PARKER DERISIVELY SAID: QUOTE "AINT NOTHING WRONG WITH THAT BEDFRAME" END QUOTE. I TOLD LT. C. PARKER THAT I CAN LOOK DOWN INTO CELLS LB-1002 AND LB-1003 AND BOTH ARE EMPTY.

LT. C. PARKER SAID: QUOTE "YOU'RE GOING TO STAY IN THIS CELL" (LB-2022).<sup>END</sup> QUOTE.

(3) I HAD TO SLEEP ON THE MATTRESS ON THE FLOOR. MY SLEEP WAS EPHEMERAL AND DISCOMFORTING.

(4) ON 18 MARCH 2015, AFTER REPEATEDLY COMPLAINING VIA INTERCOM ABOUT THE BEDFRAME FROM EARLY MORNING TILL 1:30 PM AT WHICH TIME OFC. HOLMAN CAME TO MY CELL (WITH AN UNNAMED OFC.) AND ESCORTED ME DOWNSTAIRS TO HOUSE ME IN EMPTY CELL LB-1003 WHICH DID NOT HAVE A BENT BEDFRAME. BEFORE ALLOWING ME TO ENTER THE CELL OFC. HOLMAN IDENTIFIED HIMSELF AS THE OFFICER I WAS REPEATEDLY COMPLAINING TO VIA THE INTERCOM THE EVENING BEFORE (17 MARCH 2015) AND ALL THAT MORNING (18 MARCH 2015) UNTIL HE DECIDED TO MOVE ME. OFC HOLMAN EMPHASIZED THAT HE HIMSELF MADE THIS MOVE. OFC HOLMAN STATED: QUOTE "THEY SHOULD HAVE MOVED YOU LAST NIGHT. I'M TELLING YOU RIGHT NOW THAT THE COMPLAINING STOPS NOW OR SHIT IS GONNA GET WORSE." END QUOTE. OFC HOLMAN THEN ALLOWS ME TO ENTER THE CELL AND I THANK HIM FOR THE MOVE.

(5) ON 18 MARCH 2015 AT 6:30 PM SGT. POSKA IN AN AGITATED TEMPERAMENT CAME TO MY CELL WITH 4 OFFICERS TO ESCORT ME TO INVENTORY MY PROPERTY. I WAS HANDCUFFED WITH A TORSO WAISTBELT W/LEASH AND TAKEN TO A SMALL ROOM WHERE 2 ADDITIONAL OFFICERS WERE WAITING. I LOOKED IMMEDIATELY TO THE CORNERS ABOVE AND TO THE CEILING. ONE OFFICER ASKED: QUOTE: "WHAT ARE YOU LOOKING FOR?" END QUOTE. I RESPOND: "CAMERAS." AN OFFICER SAYS: QUOTE: "AINT NONE." END QUOTE. SGT. POSKA ASKS, QUOTE: "DOES IT (MY PROPERTY) LOOK LIKE ITS ALL THERE?" END QUOTE. I RESPOND "I GOT TO CHECK IT WITH MY LIST



FROM SOMERSET," "ESPECIALLY MY LEGAL PAPERS." MY LEGAL PAPERS WERE STREWN ABOUT IN DISARRAY AND MY PERSONAL PROPERTY WAS HAPHAZARDLY PUT IN MULTIPLE PLACES NOT CONDUCTIVE TO ACCURATE INVENTORYING. AN OFFICER PROFFERED AN ALREADY FILLED OUT INVENTORY SHEET AND PEN AND SAID, QUOTE: "I NEED YOU TO SIGN RIGHT HERE." END QUOTE. I SAID: "I'VE GOT TO GO THROUGH MY LEGAL WORK TO MAKE SURE ITS ALL THERE BEFORE I SIGN." END QUOTE. NOW ANOTHER OFFICER TELLS ME HE'S TAKING MY MAGNIFYING GLASS AND A PAIR OF PRESCRIPTION EYEGLASSES. I INFORM THAT OFFICER THAT I AM FILING A GRIEVANCE (PER POLICY) TO RETAIN THE ITEMS. SGT. POSKA SAYS, QUOTE: "YOU EITHER SIGN OR GO BACK (TO CELL) WITH NOTHING." END QUOTE. I TELL SGT. POSKA, QUOTE: "I'M NOT SIGNING TILL I CHECK MY LEGAL PAPERS." END QUOTE. I WAS TAKEN BACK TO MY CELL BY SGT. POSKA AND ONE OFFICER AND WAITED OUTSIDE WHILE A VISIBLY ENRAGED SGT. POSKA 'TOSSED' MY CELL BY RIPPING THE SHEETS FROM THE BED AND THROWING ALL OF THE BEDDING ON THE FLOOR. SGT. POSKA PAUSED AT THE DESK IN THE CELL TO SCAN THE GRIEVANCE I HAD FILLED OUT ABOUT HIS ACTIONS IN DELIBERATELY HOUSING ME IN AN UNINHABITABLE CELL. APPROXIMATELY 10 MINUTES LATER WHILE I'M LOCKED IN MY CELL LT. C. PARKER APPEARS AT MY CELL DOOR AND SAYS, QUOTE: "HARRIS, ARE YOU GOING TO SIGN OFF ON ANY OF THIS STUFF?" END QUOTE. I RESPONDED: "NOT TILL I CHECK MY LEGAL PAPERS." LT. C. PARKER SAYS, QUOTE: "FINE. I'M WRITING YOU A MISCONDUCT FOR REFUSING TO SIGN." END QUOTE. THE FABRICATED MISCONDUCT REPORT (DC-141) WAS PLACED IN MY DOOR HOURS LATER.

(6) ON 19 MARCH 2015 AT 10:01 AM I OBSERVED A MAINTENANCE CREW REPLACE AND REMOVE THE HAMMOCKED BEDFRAME FROM CELL LB-2022, COMPLETING THE INSTALLATION AT 10:30 AM.

(7) ON 20 MARCH 2015 AT APPROXIMATELY 12:25 PM OFC. D. D. SMITH WAS OBSERVED BY ME WALKING ALONE TOWARDS MY CELL. OFC. D. D. SMITH STOPPED AT A DISTANCE

GREATER THAN 6 FEET, AND LOUDLY CALLED MY NAME AND SAID, QUOTE: "HARRIS HOW MANY MISCONDUCTS DO YOU HAVE?" <sup>END</sup> QUOTE I REPLIED "ONE." OFC. D.D. SMITH ASKS, "POSKA, HUH?" I REPLIED, "YEAH, DO YOU WANT TO SEE IT?" OFC. D.D. SMITH REPLIED "NAW" AND THEN PROCEEDED TO WALK UPSTAIRS. AT 1:50 PM 20 MARCH 2015 OFC. HIGGINBOTHAM DELIVERED THE HEARING DOCUMENTS FROM THE HEARING EXAMINER INDICATING THAT I REFUSED TO ATTEND THE HEARING AND THE PUNISHMENT FOR THE FABRICATED CHARGES WAS 30 DAYS DISCIPLINARY HOLE TIME WITH AN ADDITIONAL 60 DAYS 'HOLD TIME' WHICH ENTAILS NO IDLE PAY NOR EMPLOYMENT.

(8) ON 20 MARCH 2015 LATE AFTERNOON AN UNKNOWN OFFICER PLACES 3 GOLD-COLORED DOCUMENTS IN MY DOOR. I ASSUME ITS ANOTHER FALSE MISCONDUCT SO I GO TO RETRIEVE THE DOCUMENTS FROM THE DOOR ASKING THE OFFICER, "WHAT IS THIS ABOUT?" THE OFFICER, WALKING AWAY, TURNS SLIGHTLY AND SAYS, QUOTE "ITS WHAT YOU GET FOR FILING GRIEVANCES." <sup>END</sup> QUOTE. THE OFFICER HAD DELIVERED 3 DOCUMENTS THAT WERE SPECIFIED COPIES (FORMS DC-141 PART 1, DC-141 PART 2B, AND DC-154A) THE FORMER MENTIONED 2 DOCUMENTS ARE GOLDENROD (COLORED) AND THE LATTER, YELLOW, THAT WERE DEPUTY SUPERINTENDENT'S STEVEN M. GATES' COPIES. I MAILED THESE DOCUMENTS TO THIS HONORABLE COURT; RE: CIVIL ACTION #NO. 15-039.

(9) ON 23 MARCH 2015 I TALKED TO RHU LT. SWITZER AND RHU CAPTAIN WALKER BOTH AT DOOR ABOUT THE MISTREATMENT I HAD BEEN SUBJECTED TO SINCE ARRIVING AT SCI FAYETTE. THIS CONVERSATION WAS CONDUCTED DURING THESE OFFICERS MORNING ROUNDS. AT 1:20PM I WAS ESCORTED IN A MOVE FROM LB-1003 TO 'J' BLOCK 'D' POD CELL JD-2019 WHICH HAS A HAMMOCKED BEDFRAME. I COMPLAINED TO RHU OFFICERS HOLT AND DISALVO, WITH BOTH OFFICERS GIVING ME CALLOUSLY SARCASTIC RESPONSES. I TALKED TO RHU SGT. M.V. SMITH ABOUT THE BEDFRAME

THE SAME LATE AFTERNOON/EARLY EVENING OF 23 MARCH 2015 AND ABOUT MY MEDICAL ISSUES THAT WOULD BE EXACERBATED BY ATTEMPTING TO SLEEP ON THE BENT BEDFRAME. I POINTED OUT TO SGT. M.V. SMITH THAT CELL JD-2017 WHICH IS LOCATED CATTY-CORNERED TO THE CELL I WAS IN WAS EMPTY AND I REQUESTED TO MOVE INTO IT. SGT. M.V. SMITH LAUGHED AT ME AND WALKED AWAY LAUGHING, SAYING HE WOULD 'CHECK THE COMPUTER.'

(10) I SPENT THE NIGHT OF 23 MARCH 2015 INTO 24 MARCH 2015 ALTERNATING BETWEEN SLEEPING ON THE MATTRESS ON THE FLOOR AND SITTING AT THE DESK. THE RESULT WAS A VERY SORE LOWER BACK OF WHICH I DETAILED THE MISTREATMENT IN A REQUEST SLIP (DC-135A) DATED 24 MARCH 2015. I SUBMITTED TO CORRECTIONS HEALTH CARE ADMINISTRATOR (CHCA) SUSAN BERRIER, TO NO AVAIL, A TERSE, DISMISSIVE RESPONSE.

(11) ON 24 MARCH 2015 AT 7:40 PM I TALKED TO RHD LT. ROHAL ABOUT THE BEDFRAME, THE DENIAL OF MY LEGAL PAPERS, AND MY WASHCLOTH. LT. ROHAL SAID, QUOTE "NO I'M NOT MOVING YOU. AS FOR YOUR LEGAL WORK WE'LL TAKE YOU TO PROPERTY ROOM WHEN WE GET THE TIME. THE WASHCLOTH, I'LL SEND YOU ONE." <sup>END</sup> QUOTE. APPROXIMATELY HALF AN HOUR LATER OFFICER GROUCH DELIVERS TO MY CELL A WHITE WASHCLOTH WITH DISGUSTING, YELLOW STAINS, SAYING, QUOTE: "LT. ROHAL SAID TO GIVE THIS TO YOU." <sup>END</sup> QUOTE. I RETURNED IT.

(12) FOR THE SECOND CONSECUTIVE NIGHT I'M FORCED TO SLEEP ON THE FLOOR W/MATTRESS.

(13) ON 25 MARCH 2015 AT THE TIMES INDICATED I STOPPED EACH OF THE FOLLOWING STAFF MEMBERS MAKING A TOUR OF THE POD AND TOLD EACH OF THEM OF THE MISTREATMENT I HAD BEEN SUBJECTED TO AS WELL THE CURRENT SITUATION IN CELL JD-2019. AT 7:35AM DEPUTY Supt. STEVEN M. GATES, 8:05AM RHD LT. BURTON, 8:36AM MAJOR CESSARINO-MARTIN AND PROGRAM MANAGER DEBRA HAWKINBERRY (TOGETHER), 8:44AM MAJOR SCOTT NICKELSON. DURING MY TALK WITH DEP. Supt. GATES I TOLD HIM OF THE 3/6/15 CONVERSATION AT SCI SOMERSET WITH MAJOR WADSWORTH WHO STATED TO ME THAT, "DEPUTY SUPERINTENDENT GATES REMEMBERS YOU."

(14) ON 25 MARCH 2015 BETWEEN 9 AND 10 AM, AN ENRAGED RHU LT. BURTON, 2 CORRECTION OFFICERS, AND A HOSTILE RHU SGT. RICHTER CAME TO MOVE ME TO ANOTHER CELL. AFTER LT. BURTON, SCREAMING A FALSE ACCUSATION OF ME LYING TO MAJOR CESSARINO - MARTIN ABOUT HAVING NO MATTRESS, HE DIRECTS SGT. RICHTER TO MOVE ME INTO CELL JC-1011, A 'HARD CELL' WHICH IS FOR BEHAVIOR MODIFICATION OF INMATES IN RHU WHO THROW FOOD, BODY WASTE, ANYTHING AT THE OFFICERS. IT IS A MORE RESTRICTIVE MOVEMENT CELL. DURING THE MOVE SGT. RICHTER LOUDLY PROCLAIMED, QUOTE "I'M GOING TO MAKE YOUR LIFE A LIVING HELL" <sup>END</sup> QUOTE

(15) ON 26 MARCH 2015 AT 7:15 AM I ASKED SGT. RICHTER WHY HE WAS BEING HOSTILE TOWARDS ME AND HE RESPONDED, QUOTE "YOU LIKE TELLING ON US TO THE DEP AND THE MAJORS. MAJOR AINT GOING AGAINST US, YOU'RE A FUCKIN' CRYBABY. (THIS WAS SHOUTED LOUDLY FOR THE 3 OFFICERS WHO JUST ENTERED THE POD TO HEAR AND HE REPEATED IT AGAIN AS HE WAS LEAVING THE POD).

(16) ON 7 APRIL 2015 SHORTLY AFTER 6 PM SGT. POSKA AND OFC. ROBERTS ESCORTED ME TO A PROPERTY ROOM TO OBTAIN MY LEGAL PAPERS. SGT. POSKA WOULD NOT ALLOW ME TO OBTAIN ALL OF MY LEGAL PAPERS. IMMEDIATELY I NOTICED THAT THE FILE FOLDER IN WHICH 19 LABELLED DOCUMENTS WITH EXHIBIT TAGS FOR EVIDENTIARY SUPPORT IN ACTIVE CIVIL ACTION (CV-15-039) WAS EMPTY. TWO OF THESE DOCUMENTS WERE RECOVERED, 17 WERE NOT AND IMMEDIATELY I INFORMED CAPT. WALKER VIA REQUEST SLIP (DC-135A) AND DEPUTY Supt. GATES.

(17) ON 14 APRIL 2015 AN EARLY RELEASE WAS GRANTED BY DEP. Supt. ARMEL DURING THE 6 AM - 2 PM SHIFT INFORMING ME I WOULD BE RELEASED FROM THE RHU DURING THE 2<sup>PM</sup> - 10 PM SHIFT. AT APPROXIMATELY 5 PM OFC. DISALVO BRINGS ME A PAIR OF VISIBLY WORN, SMALL STATE BOOTS BELONGING TO ANOTHER INMATE. I INFORMED OFC. DISALVO THAT I HAVE ORTHOPEDIC BOOTS THAT SGT. POSKA TOOK FROM

ME THE DAY I WAS TRANSFERRED HERE AND THAT MY BOOTS WERE CLEARLY MARKED IN WHITE MARKER WITH MY NAME AND NUMBER. OFC. DISALVO SAID SGT. POSKA TOLD HIM THAT I DON'T HAVE MEDICALLY PRESCRIBED BOOTS IN MY MEDICAL FILE. OFC. ROBERTS CAME TO MY CELL AND GAVE ME AN ULTIMATUM TO EITHER WEAR THE TOO SMALL BOOTS OUT OF RHU OR GET 30 MORE DAYS. AS I AM ESCORTED OUT OF POD TO THE EXIT I AM DIRECTED TO ENTER THE CONTROL ROOM WHERE SGT. POSKA AND LT. ROHAL ARE WAITING. ON THE DESK THERE IS A PROPERTY INVENTORY SHEET (DC-153M) THAT SGT. POSKA NOW TAKES PEN AND EMPHATICALLY MARKS A LARGE 'X' ON THE INMATE SIGNATURE LINE AND SAID, QUOTE "YOU'RE GOING TO SIGN IT HERE OR ITS 30 MORE DAYS." <sup>END</sup> QUOTE WITH MY BACK BLOCK-ING SGT. POSKA'S VIEW AND MY HANDS CUFFED I WROTE 'UNDER DURESS' CURSIVELY. SGT. POSKA DID NOT CLOSELY PERUSE MY ASSUMEDLY SIGNED NAME. I WAS ESCORTED OUTSIDE WHERE TWO OTHER INMATES BEING RELEASED FROM RHU WERE WAITING WITH TWO CARTS PILED WITH THE PROPERTIES OF THE THREE OF US. AT NO TIME WAS MY PROPERTY EVER ITEM BY ITEM INVENTORIED OR INSPECTED WITH ME BEING PRE-SENT. THE RELEASE FROM RHU WAS AT APPROXIMATELY 6 PM AND WE WERE ESCORTED THE ENTIRE 1/4 MILE ARDUOUS TREK, MADE SO BECAUSE OF THE TOO SMALL BOOTS CAUSING ME PAIN AND DISCOMFORT, BY THEN OFC. CERONE, NOW A LIEUTENANT, WHO IGNORED MY COMPLAINTS OF PAIN IN MY KNEES AND HIP, AND WHEN I PAUSED TO ALLEVIATE THE PAIN OFC. CERONE ORDERED, QUOTE "KEEP IT MOVIN'." <sup>END</sup> QUOTE. UPON REACHING 'G' BLOCK (INTAKE BLOCK) I OPEN MY FOOTLOCKER TO FIND POWDERED COFFEE CREAMER FROM A CUT OPEN BAG COATING MY PERSONAL PROPERTY WITHIN THE TRUNK. I GO TO INFORM THE BLOCK SGT. (SGT. RACKO) OF THE MISTREATMENT I WAS SUBJECTED TO BY RHU STAFF AND THE DESTRUCTION OF SOME PROPERTY ITEMS AND SGT. RACKO THREATENS TO ISSUE ME A MIS-CONDUCT IF I CONTINUE TO SPEAK ABOUT THE 'BAD THINGS' HIS CO-WORKERS DID.

(18) ON 15 APRIL 2015 'G' BLOCK UNIT MANAGER PALMER BRINGS MY ORTHOPEDIC BOOTS

TO ME FROM RHU.

(19) ON 16 APRIL 2015 I FILED TWO SEPARATE GRIEVANCES: #562179 EXPLICITLY FOR DAMAGING AND DESTRUCTION OF PRECISELY IDENTIFIED PERSONAL PROPERTY ITEMS, TV, RADIO, LAMP LIGHT BULB, MIRROR, BAG OF COFFEE CREAMER, CONTAINER OF CHEST RUB. GRIEVANCE #564053 EXPLICITLY FOR USURPATION OF PRECISELY IDENTIFIED ITEMS UNLAWFULLY TAKEN WITHOUT DUE PROCESS OF LAW: IT LABELLED COURT EXHIBITS REGARDING AN ACTIVE CIVIL ACTION (CV-15-039), CIRCULAR AM BAND ANTENNA, WASHCLOTH, AND THE PERSONAL PROPERTY INVENTORY RECEIPT DATED 14 MARCH 2015 FOR TRANSFER OUT OF SCI SOMERSET. GRIEVANCE COORDINATOR RHONDA HOUSE CAPRICIOUSLY AND ARBITRARILY REFUSES TO PROCESS #564053 AND REJECTS IT WITH THE RATIONALE THAT THE USURPATION ISSUE WAS BEING REVIEWED/ADDRESSED IN #562179. THE ACT OF TRYING TO INCORPORATE DIAMETRICALLY DIVERSE ISSUES WHILE EMPLOYING MENDACITIES IN COMPLICITY WITH EACH GRIEVANCE OFFICER ARBITRATING THE DESTRUCTION/DAMAGE GRIEVANCE #562179 AS WELL AS ACTING SUPERINTENDENT NICKELSON, IS PERPETRATED BY RHONDA HOUSE TO BURY/OBSCURE THE EGREGIOUS TRANSGRESSION OF USURPING THE COURT DOCUMENTS TO INJURE MY PROSECUTION OF CV-15-039.

(20) ON 11 AUGUST 2015 I REVIEWED MY MEDICAL RECORDS AND DISCOVERED AN ENTRY SURREPTITIOUSLY PENNED BY NURSE PRACTITIONER, ALICE MAKIN, DATED 19 MARCH 2015, TWO DAYS AFTER I WAS TRANSFERRED BACK TO SCI FAYETTE. NO CONTACT WITH THE MEDICAL DEPARTMENT OCCURRED ON 19 MARCH 2015 TO EFFECTUATE ANY ENTRY. MAKIN HAD NOT SEEN ME NOR EXAMINED, YET SHE ENTERS A JOB RESTRICTION BANNING ME FROM WORKING DIETARY AND JANITOR JOBS. THE UNWARRANTED RESTRICTION IS NOT SUPPORTED BY DEPARTMENTAL NOR INSTITUTIONAL POLICY. MAKIN ARBITRARILY PROHIBITS ME FROM EMPLOYMENT TO EARN WAGES CLAIMING MY WEARING OF KNEE SLEEVES AND PRIOR (1981) SUR-



GERY TO MY RIGHT HIP AND FOREARM THAT ARE COMPLETELY HEALED AFTER 34 YEARS. AT THIS SAME AND PRESENT TIME MAKIN AND CHCA BERRIER IN A COMPLICIT ACT OF BIGOTRY ALLOW A WHITE INMATE, WITH AN ABOVE KNEE AMPUTATION, TO WORK IN DIETARY. THE WHITE INMATE WEARS A PROSTHESIS WHILE WORKING IN THE SAME CONDITIONS, 'WET FLOORS', THAT MAKIN CITES AS THE REASON FOR THE RESTRICTION. THE WHITE INMATE IS IDENTIFIED AS JOSH GARTLAND WHO, WHEN TRAVELING TO EAT IN THE MESSHALL, DOES NOT WEAR THE PROSTHESIS, BUT USES TWO CRUTCHES. THE UNWARRANTED JOBS RESTRICTION IS LEVIED IN RETALIATION FOR PAST LEGAL ACTION AGAINST STILL IN-PLACE MEDICAL DIRECTOR. GRIEVANCES WERE FILED TIMELY ON 20 AUG. 2015, 2 SEPT. 2015, AND 4 SEPT. 2015 ON EQUAL TREATMENT, B.I-GOTRY, OFFICIAL OPPRESSION, AND RACIAL DISCRIMINATION. GRIEVANCE COORDINATOR RHONDA HOUSE ARBITRARILY AND CAPRICIOUSLY REJECTED THEM FALSELY CLAIMING THEY WERE NOT FILED TIMELY.

### FACTS

- (1) THE BEDFRAMES WERE DELIBERATELY BENT BY SCI FAYETTE'S STAFF USING TOOLS EXERTING TREMENDOUS FORCE TO BEND A BEDFRAME CONSTRUCTED OF 11 GAUGE COLD-ROLLED STEEL, BRACKETED AND BOLTED TO THE WALL.
- (2) THE RHU IS A LEVEL 5 (HIGHEST SECURITY) HOUSING UNIT WHEREAS INMATES HAVE NO ACCESS TO TOOLS/MACHINERY REQUIRED TO BEND STEEL.
- (3) THE PLACEMENT OF THE IMPLEMENT USED TO BEND THE BEDFRAME INTO A HAMMOCK SHAPE LEFT THE SAME, IDENTICAL MARKS IN THE EXACT LOCATION ON EACH BEDFRAME, MID-LENGTH AGAINST MATTRESS STOP (A 2-INCH HIGH BARRIER THE LENGTH OF THE BEDFRAME.
- (4) I WORKED APPROXIMATELY 5 YEARS IN PENNA.'S DEPT. OF CORRECTIONS CORRECTIONAL INDUSTRIES METAL SHOP (WELDING) MANUFACTURING THOUSANDS

OF THESE BEDFRAMES, INCLUDING THE BEDFRAMES, LOCKERS, AND OTHER METAL FURNITURE IN THE CELLS OF SCI FAYETTE, BEFORE SCI FAYETTE OPENED.

(5) NO HUMAN BEING SANS TOOLS/MACHINERY CAN BEND THESE BEDFRAMES INTO HAMMOCK SHAPE.

(6) THE RUSTED, TELLTALE PARALLEL STRIATIONS LEFT BY THE IMPLEMENT IS INDICATIVE OF THE DAMAGES OCCURRING YEARS PAST.

(7) THE DELIBERATELY BENT BEDFRAMES ARE TORTURE DEVICES THAT ALL RHW, STAFF, FROM THE OFFICER TO THE UNIT MANAGER, KNOW WHICH CELLS IN "J" AND "L" BLOCKS ARE LOCATED.

(8) THE ACTS OF PLACING ME IN CELLS WITH HAMMOCKED BEDFRAMES, WHILE OTHER AVAILABLE, EMPTY CELLS WITH UNDAMAGED BEDFRAMES ARE DENIED TO ME, CONSTITUTE PREMEDITATION WITH COWARDLY, CALLOUS MISTREATMENT AFORETHOUGHT IN RETALIATION FOR FILING GRIEVANCES AND LAWSUITS, BOTH CONSTITUTIONALLY PROTECTED ACTIVITIES/CONDUCTS. A FIRST AMENDMENT VIOLATION.

#### (9) VERIFICATION

I HAVE READ THE FOREGOING, CHRONICLE OF EVENTS AT SCI SOMERSET AND SCI FAYETTE IN THIS COMPLAINT, AND THE EIGHT ADDITIONAL STATEMENTS OF FACTS, AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATE 9 NOVEMBER 2015

SI William Harris, PRO SE

WILLIAM HARRIS CX7039

50 OVERLOOK DRIVE

LABELLE, PENNA., 15450-0999



(8)

PREAMBLE TO SYNOPSIS OF NAMED DEFENDANTS AND RELATED CHARGES

(1) THE FOLLOWING NAMED DEFENDANTS WILLFULLY, KNOWINGLY, AND ACTING WITH MALICE AFORETHOUGHT RETALIATED IN A "CAMPAIGN OF RETALIATORY HARASSMENT" AGAINST ME FOR EXERCISING MY CONSTITUTIONALLY PROTECTED ACTIVITY/CONDUCT IN FILING COMPLAINTS, GRIEVANCES, AND CIVIL ACTIONS AGAINST PRISON OFFICIALS, THUS VIOLATING MY FIRST AMENDMENT RIGHT TO FREEDOM OF SPEECH, AND THE FOLLOWING STATUTES: 42 U.S.C. § 1997 CIVIL RIGHTS OF INSTITUTIONALIZED PERSONS; § 1997d 'PROHIBITION OF RETALIATION' - "WHEREIN NO PERSON REPORTING CONDITIONS WHICH MAY CONSTITUTE A VIOLATION UNDER THIS ACT SHALL BE SUBJECTED TO RETALIATION IN ANY MANNER FOR SO REPORTING." ALSO SECTION 2 OF THE KU KLUX KLAN ACT OF 1871 - SECTION 1 (42 U.S.C. § 1983)... IT IS A FELONY FOR ANY "TWO OR MORE PERSONS" TO CONSPIRE TO COMMIT CERTAIN ENUMERATED CRIMES IN VIOLATION OF THE RIGHTS, PRIVILEGES, OR IMMUNITIES OF ANY PERSON, TO WHICH HE IS ENTITLED UNDER THE U.S. CONSTITUTION.

(2) DEFENDANTS: #1. (FIRST NAME UNK.) POSKA, RHW SERGEANT, IN COMPLICITY WITH OTHER NAMED RHW STAFF DEFENDANTS DID VIOLATE MY CONSTITUTIONALLY PROTECTED RIGHTS UNDER THE FIRST, FOURTH, FIFTH, EIGHTH, AND FOURTEENTH AMENDMENTS BY COMMITTING WITH PERNICIOUSNESS AND EVIL INTENT; CRUEL AND UNUSUAL PUNISHMENT, ETHNIC INTIMIDATION/HECTORING, LYING ON AN OFFICIAL DOCUMENT, MALICIOUS PERSECUTION (FALSE MISCONDUCT REPORT), FALSE IMPRISONMENT (HOLE TIME), DESTRUCTION AND DAMAGING OF PERSONAL PROPERTY ITEMS, USURPATION OF LEGAL DOCUMENTS OF AN ACTIVE CIVIL ACTION, AND PERSONAL PROPERTY ITEMS, VIOLATION OF DUE PROCESS OF LAW, AND VIOLATION OF EQUAL PROTECTION CLAUSE, AND OFFICIAL OPPRESSION. EXHAUSTION REQUIREMENT FULFILLED; 42 U.S.C.A. § 1997 c(a) PER GRIEVANCES # 562179, 557320, 564053, 557471, AND 561936. #2. (FIRST NAME UNK.) C. PARKER, RHW LIEUTENANT, IN COMPLICITY

WITH AFOREMENTIONED DEFENDANT POSKA AS WELL AS NAMED/UNNAMED RHU PERSONNEL, HAVE PERSONAL INVOLVEMENT, ACTIVE PARTICIPATION, AND KNOWLEDGE OF THE CHARGES CITED AND THE VIOLATIONS OF MY CONSTITUTIONAL RIGHTS CITED, THE REPLICATION OF THE SAME OFFENSES IS APPLIED INCLUDING THE AFOREMENTIONED EXHAUSTION REQUIRED GRIEVANCES.

#3. BRIAN V. COLEMAN, SUPERINTENDENT, IN COMPLICITY WITH EACH DEFENDANT IN THIS CIVIL ACTION, HAD PERSONAL INVOLVEMENT IN MALTREATMENT INCIDENTS WHEREAS HE CONSCIOUSLY AND KNOWINGLY 'TURNED A BLIND EYE' TO MY REPEATED REQUESTS TO HIM FOR INTERVENTION AND CESSATION OF ALL MANNERS AND INCIDENTS OF MISTREATMENT VIA GRIEVANCES DENIALS AND REQUEST SLIPS, THE LATTER OF WHICH HE PRETERMITTED TO AVOID RECTIFICATION. THE REPLICATION OF THE SAME AFOREMENTIONED CHARGES CITED AND THE VIOLATIONS OF MY CONSTITUTIONAL RIGHTS CITED AND ALL GRIEVANCES LISTED, IN EXHAUSTION REQUIREMENT FULFILLED AFOREMENTIONED AND ADDITIONALLY #557689, #557914, 565707, 576015, 566543, . #4. SCOTT NICKELSON, INITIALLY RANK OF MAJOR, HERETOFORE THIS WRITING, ACTING SUPERINTENDENT, IN COMPLICITY WITH EACH DEFENDANT IN THIS CIVIL ACTION, IN THE RANK OF MAJOR, 'TURNED A BLIND EYE' TO THE MISTREATMENT I WAS BEING SUBJECTED TO WHILE I WAS IN THE RHU AND COMPLAINED TO HIM ABOUT (THEN MAJOR NICKELSON HAD A FIRST-HAND LOOK AT BENT BEDFRAME IN CELL JD-2019 AT 8:44 AM ON 25 MARCH 2015) AND THE DENIAL OF ACCESS TO MY LEGAL PAPERS AND A WASHCLOTH. THEN MAJOR NICKELSON ELECTED TO PRETERMIT AND ALLOW THE ABUSE TO GO ON UNABATED. THIS DELIBERATE INDIFFERENCE FRAME OF MIND IS SUPPORTED BY RHU'S SGT. RICHTER'S LOUD PROCLAMATION TO ME AT 7:15 AM ON 26 MARCH 2015 "MAJOR AINT GOING AGAINST US." THIS WAS DURING MY TIME IN RHU. AS ACTING SGT., HE ROUTINELY DENIED MERITORIOUS GRIEVANCES ARBITRARILY TO ABSOLVE STAFF OF EGREGIOUS VIOLATIONS OF MY RIGHTS INVOLVING RACIAL DISCRIMINATION, BIGOTRY, AND UNEQUAL TREATMENT, IN PARTICULARLY GRIEVANCE #585166. DEFENDANT NICKELSON.

HAD THE POWER AND AUTHORITY AS MAJOR AND ACTING SUPERINTENDENT TO RECTIFY INCIDENTS COMPLAINED OF, BUT CONSCIOUSLY CHOSE TO IGNORE, DENY, AND DISCREDIT MY COMPLAINTS. HE IS LIABLE AND IS CHARGED WITH THE REPLICATED CHARGES AND VIOLATIONS CITED IN THE NARRATIVES OF THE AFOREMENTIONED DEFENDANTS. #5. RHONDA A. HOUSE, GRIEVANCE COORDINATOR, IS CHARGED WITH WILLFULLY AND KNOWINGLY DENYING ME DUE PROCESS OF LAW IN INTENTIONALLY USING MENDACITIES AS RATIONALE TO REJECT GRIEVANCES AND NOT PROCESS THEM. SHE REJECTS GRIEVANCE #564053 CONCERNING THE USURPATION OF LABELLED COURT DOCUMENTS (EXHIBITS REGARDING AN ACTIVE LAWSUIT AGAINST ANOTHER FACILITY'S STAFF), PROPERTY INVENTORY RECEIPT, WASHCLOTH, AND CIRCULAR ANTENNA EXPLICITLY SPECIFIED AS UNLAWFULLY CONFISCATED PROPERTY. DEFENDANT MENDACIOUSLY STATES THAT THE USURPATION ISSUE HAS BEEN REVIEWED/OR CURRENTLY BEING REVIEWED IN ANOTHER GRIEVANCE #562179 WHICH IS EXPLICITLY ABOUT THE DESTRUCTION/DAMAGING OF SPECIFIED PERSONAL PROPERTY: TV, RADIO, BAG OF COFFEE CREAMER, LAMPLIGHT BULB, JAR OF CHESTRUB, AND A MIRROR. THIS IS AN OBVIOUS ATTEMPT TO UNLAWFULLY INCORPORATE CAPRICIOUSLY A COMPLETELY DIFFERENT, AND SEPARATE GRIEVED ISSUE TO 'BURY IT' AND TO OBSCURE THE VERY EGREGIOUS MATTER OF THE LEGAL DOCUMENTS (IT OF 19 LABELLED EXHIBITS RE: CV-15-039) BEING PURLOINED BY THE RHU STAFF. DEFENDANT HOUSE UNLAWFULLY CLAIMS THAT I DID NOT SUBMIT A GRIEVANCE ON 9 JUNE 2015 ALTHOUGH A REVIEW OF THE SURVEILLANCE VIDEO OF THE GRIEVANCE BOX OUTSIDE MESSHALL #2 WILL REFUTE HER MENDACITY. GRIEVANCE #576172, 585166, 576015, AND 557471. DEFENDANT HOUSE IS CHARGED ALSO WITH OFFICIAL OPPRESSION. #6. (FIRST NAME UNK.) WALKER, RHU CAPTAIN, IN COMPLI- CITY WITH ALL RHU STAFF NAMED/UNNAMED AS DEFENDANTS, THROUGH PERSONAL INVOLVEMENT WITH PARTICULARITY, AND AS THE HIGHEST RANKING OFFICER IN RHU WITH OVERALL AUTHORITY KNOWINGLY HAS MAINTAINED FOR YEARS IN THE RHU

INTENTIONALLY 'HAMMOCKED' (BENT) BEDFRAMES IN DESIGNATED CELLS TO BE USED AS TORTURE DEVICES TO PUNISH INMATES. DEFENDANT WALKER 'TURNS A BLIND EYE AND DEAF EAR' TO THE MISTREATMENT OF INMATES BY HIS STAFF. I PERSONALLY INFORMED DEFENDANT WALKER ON 23 MARCH 2015 (WHILE HE MADE ROUNDS ACCOMPANIED BY RHU LT. SWITZER) OF THE MISTREATMENT OF HIS RHU STAFF INVOLVING BENT BEDFRAME, ETHNIC INTIMIDATION INCIDENT (BEING ESCORTED TO PROPERTY ROOM BY HOSTILE SERGEANT POSKA AND 4 OFFICERS TO PROPERTY ROOM OCCUPIED BY 2 WAITING OFFICERS FOR TOTAL OF 7 WHITE OFFICERS IN A ROOM WITH NO CAMERA SURVEILLANCE TO COERCE ME INTO SIGNING A PROPERTY INVENTORY RECEIPT), THE FALSE MISCONDUCT AND THE SUBTERFUGE INVOLVED IN DENYING ME THE OPPORTUNITY TO ATTEND MY HEARING, AND AT LATER DATES VIA REQUEST SLIPS I SUBMITTED TO DEFENDANT WALKER ABOUT THE DEPRIVATION AND USURPATION OF MY COURT DOCUMENTS. I WAS DEPRIVED OF ALL MY LEGAL DOCUMENTS INVOLVING AN ACTIVE CIVIL ACTION AND PENDING GRIEVANCES WHICH I NEEDED TO RESEARCH CASES IN THE LAW LIBRARY. FROM 18 MARCH 2015 TO 7 APRIL 2015 RHU STAFF REFUSED TO ALLOW ME ACCESS TO MY LEGAL PAPERS THUS BLOCKING MY ACCESS TO THE COURTS.

#7 STEVE BUZAS, RHU UNIT MANAGER, KNOWINGLY MAINTAINING DELIBERATELY BENT BED FRAMES IN RHU (J AND L BLOCKS) THAT ARE TORTURE DEVICES DESIGNED TO DEPRIVE AN INMATE OF SLEEP AND/OR IF SLEEP IS ATTAINED, PAIN AND DISCOMFORT IS INEVITABLY THE INTENDED RESULT IN THE LUMBAR AND PELVIC REGIONS. DEFENDANT BUZAS REFUSED TO RESPOND TO MY REQUEST SLIPS DETAILING THE INCIDENTS OF ETHNIC INTIMIDATION, FALSE MISCONDUCT, BENT BEDFRAMES (IN WHICH HE MENDACIOUSLY CLAIMS TO HAVE NO KNOWLEDGE OF UNTIL I FILED GRIEVANCES/COMPLAINT OF THE FIRST BENT BEDFRAME INCIDENT 17 MARCH 2015), DEPRIVATION AND USURPATION OF MY LEGAL DOCUMENTS, AND OFFICER D.D. SMITH'S ACTIONS IN VIOLATING MY RIGHTS TO ATTEND MY HEARING.

#8 J.M. SKROBACZ, CORRECTIONS OFFICER, RHU, ON 18 MARCH 2015 WROTE A FALSE MIS-  
 CONDUCT ON ME ALLEGING THAT I USED PROFANE LANGUAGE AND HAD "A LONG PIECE OF  
 METAL WIRE" AND THREE OTHER INNOCUOUS ITEMS THAT WERE DEEMED CONTRABAND  
 BUT IN ACTUALITY WERE NOT. THE "LONG PIECE OF WIRE" BECAME WHAT IT ACTUALLY  
 WAS, A CIRCULAR AM ANTENNA (AFFIXED TO MY G.E. SUPER III RADIO'S GROUND AND  
 AM TERMINALS WITH A PHILIP'S SCREWDRIVER ON 22 MAY 2002 BY THE PROPERTY  
 SERGEANT AT SCI PITTSBURGH) ON GRIEVANCE RESPONSES #562179 AND 564053.  
 DEFENDANT SKROBACZ WAS ONE OF THE SEVEN WHITE OFFICERS SURROUNDING ME IN  
 A ROOM SANS SURVEILLANCE INTENDED TO COERCE ME WHILE I'M HANDCUFFED AND  
 TETHERED WITH A WAISTBELT AND LEASH, INTO SIGNING A PROPERTY RECEIPT WITH-  
 OUT PROPERLY INVENTORING ITEM BY ITEM AND INSPECTION OF MY LEGAL DOCUMENTS.  
 THE TYPICAL PROCEDURE FOR AN INMATE TO INVENTORY HIS PROPERTY IN RHU IS FOR  
 TWO OFFICERS TO ESCORT THE INMATE TO THE PROPERTY ROOM, DO A PROPER INVENTORY AND  
 THE SAME TWO OFFICERS ESCORT THE INMATE BACK TO HIS CELL. I STOICALLY RE-  
 FUSED TO SIGN THE PROPERTY RECEIPT BECAUSE NO PROPER PROCEDURES WERE BEING  
 FOLLOWED AND I WAS NOT ABLE TO INSPECT MY LEGAL DOCUMENTS. IN THE MIDST OF  
 HOSTILE ENVIRONS I SAPIENTLY DID NOT USE PROFANITY. #9 (FIRST NAME UNK.) ROHAL,  
 LIEUTENANT REFUSED TO MOVE ME FROM CELL JD-2019 WHICH HAD A DELIBERATELY  
 BENT BEDFRAME INTO HAMMOCK SHAPE. ON 24 MARCH 2015 AT 7<sup>40</sup>PM I ASKED LT. ROHAL  
 TO MOVE ME INTO EMPTY CELL JD-2017 AND HE REFUSED. ON 14 APRIL 2015 LT. ROHAL  
 WITHHELD MY ORTHOPEDIC BOOTS, FORCING ME TO TREK A 1/4 MILE DISTANCE IN ANOTHER  
 INMATE'S BOOTS UPON LEAVING RHU RESULTING IN PAIN IN MY FEET, HIP, AND LOWER  
 BACK. GRIEVANCES #557914 AND 561936, RESPECTIVELY. #10 D.D. SMITH, CORRECT-  
 IONS OFFICER DID ON 20 MARCH 2015 IN A STAGED ACT OF SUBTERFUGE DENIED ME  
 DUE PROCESS OF LAW IN REFUSING TO ALLOW ME TO ATTEND MY HEARING ON A

FALSE MISCONDUCT. GRIEVANCE #557689. THE MATTER WAS GRIEVED AND A SHAM INVESTIGATION BY AN RHU LIEUTENANT CLAIMS THAT SURVEILLANCE VIDEO SHOWS DEFENDANT SMITH "AT" MY DOOR, BUT IN ACTUALITY HE IS SIX FEET OR MORE FROM MY CELL DOOR FOR PURPOSES OF BEING VIEWED BY THE CAMERA IN A RUSE SUPPOSEDLY TALKING TO ME ABOUT ATTENDING MY HEARING. THE PROTOCOL IS FOR TWO OFFICERS WITH HANDCUFFS, WAIST BELT, AND TETHERING LEASH TO GO ALL THE WAY TO THE INMATE'S DOOR TO FIRST STRIPSEARCH HIM, OBSERVE HIS RE-DRESS, CLIFF HIM AND TETHER WITH THE LEASH, AND ESCORT THE INMATE TO THE HEARING. IN ATYPICAL FASHION DEFENDANT D.D. SMITH IS NOT EVEN IN ARM'S LENGTH OF MY CELL DOOR AND HIS ESCORTING PARTNER IS NOT WITH HIM. THE SURVEILLANCE VIDEO WILL CONFIRM THIS FACT. THE RESULT WAS 30 DAYS OF HOLE TIME WITH A FOLLOWING 60 DAYS OF NO EMPLOYMENT OPPORTUNITY AND NO IDLE PAY. <sup>FF</sup>11 STEVEN M. GATES, DEPUTY SUPERINTENDENT WAS INFORMED BY ME VIA A 23 MARCH 2015 REQUEST SLIP OF THE MISTREATMENT I WAS BEING SUBJECTED TO, THE FALSE MISCONDUCT, DENIAL OF THE OPPORTUNITY TO ATTEND MY HEARING, AND OF THE 6 MARCH 2015 CONVERSATION WHILE IN SCI SOMERSET'S RHU WITH MAJOR WADSWORTH WHO TOLD ME OF THE IMPENDING TRANSFER TO SCI FAYETTE AND THAT DEPUTY Supt. GATES REMEMBERS ME. ON 25 MARCH 2015, I TALKED TO DEFENDANT GATES ABOUT THE BENT BEDFRAME IN THE CELL I WAS IN AND ABOUT THE DEPRIVATION OF MY LEGAL DOCUMENTS. I INFORMED DEFENDANT GATES OF THE USURPATION OF 17 LABELLED COURT DOCUMENTS; EXHIBITS IN AN ACTIVE CIVIL ACTION CV-15-039, VIA A REQUEST SLIP DATED 8 APRIL 2015 AND HE CHOSE TO SHUN RECTIFICATION EVEN IGNORING THE EGREGIOUS OFFENSE OF RHU STAFF USURPING COURT DOCUMENTS TO HINDER ME IN PROSECUTION OF MY CIVIL ACTION AGAINST PERSONNEL AT SCI SOMERSET. DEFENDANT GATES IN A CALLOUS, DELIBERATE INDIFFERENCE FRAME OF MIND, IN COMPLICITY WITH SCI SOMERSET'S



MAJOR WADSWORTH AND SUPERINTENDENT TREVOR WINGARD, DEFENDANT #21, AND #22 WADSWORTH, DID CONSPIRE TO HAVE ME TRANSFERRED BACK TO SCI FAYETTE WHERE I WAS TRANSFERRED FROM ON 20 DECEMBER 2005 FOR FILING GRIEVANCES AND A CIVIL ACTION. THE RETALIATORY TRANSFER TO SCI FAYETTE ON 17 MARCH 2015 FOR FILING CIVIL ACTION CV-15-039 WAS DEMONSTRATIVELY EXPRESSED IMMEDIATELY BY THE RHU STAFF BY PLACEMENT IN AN UNINHABITABLE CELL AND EMPHASIZED BY EVERY CLAIM OF VIOLATIONS OF MY CIVIL RIGHTS IN THIS CIVIL ACTION. IT IS FALSELY ALLEGED ON FORM DC-141 PART 1 NUMBER B549832 THAT PER DIRECTION OF LT. STALEY THAT I WAS PLACED IN ADMINISTRATIVE CUSTODY BECAUSE OF NO RECORDS AND ESSENTIAL INFORMATION ABOUT ME WAS AVAILABLE. THIS IS REFUTED BY MAJOR WADSWORTH INFORMING ME ELEVEN DAYS BEFORE THE TRANSFER AND HIS CONVERSATION WITH DEFENDANT GATES. SCI FAYETTE KNEW EVERYTHING ABOUT ME AND I WAS EXPECTED IN PARTICULAR BY RHU STAFF AND THE MEDICAL STAFF. DEFENDANT GATES TURNED A BLIND EYE TO MY MISTREATMENT.

#12 ERIC T. ARMEL, DEPUTY SUPERINTENDENT IS PERSONALLY INVOLVED IN THE MATTERS OF MISTREATMENT BY RHU STAFF WHEN HE STOPPED AT MY CELL TO TALK TO ME ABOUT MY IMPENDING HEARING (EXHIBIT #2 GRIEVANCE 557689) AND THE DEPRIVATION OF MY LEGAL PAPERWORK. I TALKED TO DEFENDANT ARMEL ABOUT THE BENT BEDFRAME MY FIRST NIGHT BACK AT SCI FAYETTE AND THE FALSE MISCONDUCT OF WHICH I WAS ANXIOUS AND WAITING TO GO TO THE HEARING. DEFENDANT ARMEL ASSURED ME THAT HE WOULD "CHECK IT OUT", BUT TURNED A BLIND EYE TO MY VALID COMPLAINTS. HE REFUSED TO RESPOND TO CORRESPONDENCE I SENT TO HIM ABOUT THE ONGOING ABUSES I WAS SUBJECTED TO IN RHU. ON 26 MAY 2015 I ENCOUNTERED DEFENDANT ARMEL ON THE WALKWAY AND TOLD HIM OF THE DAMAGES AND DESTRUCTION OF MY PERSONAL PROPERTY BY THE RHU STAFF. DEFENDANT ARMEL

TOLD ME: QUOTE "YOU SHOULD BE GRATEFUL I GOT YOU RELEASED EARLY. YOU OWE ME." <sup>END</sup> QUOTE ARMEL WAS REFERRING TO HIS BEING ON THE COMMITTEE WHICH VOTED TO RELEASE ME 5 DAYS EARLY FROM A 30 DAY HOLE SANCTION. THIS IS INDICATIVE OF HIS CALLOUS DELIBERATE INDIFFERENCE FRAME OF MIND TO MISTREATMENT BY RHM STAFF.

#13 DEFENDANT RHM LIEUTENANT BURTON IN CHARGE OF RHM'S "J" BLOCK, IN COMPLICITY WITH RHM STAFF ABOVE AND BELOW HIM IN RANK KNOWINGLY PERPETUATES THE CULTURE OF MISTREATMENT OF INMATES IN RHM BY MAINTAINING THE EXISTENCE OF DELIBERATELY BENT BEDFRAMES INTENDED TO PUNISH INMATES. DEFENDANT BURTON TURNED A BLIND EYE TO ME BEING PLACED IN CELL JD-2019 ON 23 MARCH 2015 WITH THE UNINHABITABLE BENT BEDFRAME, DID NOT MOVE ME TO A CELL WITH A SERVICABLE BED UNTIL HE WAS ORDERED TO BY MAJOR CESSARINO-MARTIN ON 25 MARCH 2015 AND THEN HAD ME MOVED INTO A 'HARD CELL' INTENDED FOR RECALCITRANT INMATES.

#14 DEFENDANT RHM LIEUTENANT SWITZER IN CHARGE OF RHM'S "L" BLOCK, IN COMPLICITY WITH RHM STAFF ABOVE AND BELOW HIM IN RANK KNOWINGLY PERPETUATES THE CULTURE OF MISTREATMENT OF INMATES IN RHM BY MAINTAINING THE EXISTENCE OF BENT BEDFRAMES INTENDED TO PUNISH INMATES. DEFENDANT LT. SWITZER REFUSED TO MOVE ME FROM CELL LB-2022 ON 18 MARCH 2015, IGNORING MY COMPLAINTS VIA THE INTERCOM AND ON <sup>23</sup> MARCH 2015 HAD ME MOVED TO 'J' BLOCK INTO A CELL WITH BENT BEDFRAME. DEFENDANT SWITZER PROVIDED MENDACIOUS RESPONSES IN THE INITIAL STAGES OF THE GRIEVANCE PROCESS ON GRIEVANCES FILED BY ME AGAINST RHM STAFF INVOLVING MISTREATMENT AND DUE PROCESS OF LAW CLAIMS, KNOWING VIOLATING MY CONSTITUTIONAL RIGHTS.



#15 DEFENDANT CORRECTIONS OFFICER (RHU) ROBERTS THREATENED ME ON 14 APRIL 2015 WITH AN ADDITIONAL 30 DAYS IN THE HOLE IF I REFUSED TO WEAR A PAIR OF BOOTS TWO SIZES TOO SMALL, BELONGING TO ANOTHER INMATE, TO LEAVE THE RHU. DEFENDANT ROBERTS INTENTIONALLY WITHHELD MY ORTHOPEDIC BOOTS CAUSING TO WALK THE  $\frac{1}{4}$  MILE DISTANCE TO 'G' BLOCK CAUSING PAIN IN MY HIP, KNEES, AND LOWER BACK. (EXH.#5 GRIEVANCE 561936)

#16 DEFENDANT RHU SERGEANT DOBISH ACTED IN COMPLICITY WITH HIS SUPERIORS AND SUBORDINATES IN "L BLOCK'S" RHU KNOWING PERPETUATES THE CULTURE OF MISTREATMENT OF INMATES BY MAINTAINING THE EXISTENCE OF BENT BEDFRAMES, REFUSING TO MOVE ME TO A SERVICABLE CELL ON 18 MARCH 2015 AND ON 20 MARCH 2015 I ENGAGED DEFENDANT SGT. DOBISH AT A TIME APPROXIMATELY 10<sup>AM</sup> TO 1030<sup>AM</sup> IN CONVERSATION ABOUT MY DESIRE TO ATTEND MY IMPENDING HEARING, THE DISPOSITION OF THE HEARING EXAMINER OBJECTIVITY TO FAIRNESS, AND THE TIME OF THE HEARING. DEFENDANT SGT. DOBISH KNEW I WANTED TO ATTEND MY HEARING YET HE TURNED A BLIND EYE TO THE SUBTERFUGE PERPETRATED BY DEFENDANT RHU CORRECTIONS OFFICER D.D. SMITH IN THE ORCHESTRATED, STAGED CHARADE THAT DENIED ME THE OPPORTUNITY TO DEFEND MYSELF.

#17 DEFENDANT RHU CORRECTIONS OFFICER WENTZEL MENDACIOUSLY SIGNED A WAIVER OF DISCIPLINARY PROCEEDINGS FORM ON 20 MARCH 2015 STATING THAT I REFUSED TO SIGN THE FORM, ALONG WITH UNKNOWN OFFICER, DUE TO HIS ILLEGIBLE SIGNATURE, WHEN IN FACTUAL ACTUALITY OFFICER WENTZEL NEVER CAME TO MY CELL ON 20 MARCH 2015. SURVEILLANCE VIDEO FOOTAGE CAN AND WILL REVEAL THAT ON 20 MARCH 2015 THE ONLY TIMES TWO OFFICERS CAME TO MY CELL WERE AT MEAL TIMES TO SERVE FOOD AND LATER TO RE-

TRIEVE FOOD TRAYS, THE MISCONDUCT HEARING TOOK PLACE APPROXIMATELY AROUND 1230<sup>PM</sup>. FROM 12<sup>30PM</sup> TO THE END OF DEFENDANT WENTZEL'S SHIFT AT 2PM HE IS NOT ON VIDEO SURVEILLANCE WITH ANOTHER OFFICER COMING TO MY CELL. DEFENDANT WENTZEL IS COMPLICIT IN DENIAL OF MY RIGHT TO DUE PROCESS RESULTING IN A 30 DAYS SENTENCE IN THE HOLE.

#18 DEFENDANT CHCA SUSAN BERRIER ACTED WITH CALLOUS, DELIBERATE INDIFFERENCE TO MY PAIN AND SUFFERING OF WHICH I INFORMED HER VIA A REQUEST SLIP 24 MARCH 2015 DETAILING THE MISTREATMENT I WAS BEING SUBJECTED TO RESULTING IN PAIN IN MY LOWER BACK AND DEPRIVATION OF SLEEP FROM BEING PLACED IN CELLS WITH HAMMOCKED BEDFRAMES. DEFENDANT BERRIER, AKA NURSING SUPERVISOR MENDACIOUSLY TOLD INVESTIGATING GRIEVANCE OFFICERS THAT I HAVE NO 'ORDER' FOR ORTHOPEDIC BOOTS IN MY MEDICAL FILE (EXH. #5 GRIEVANCE 561936). EVIDENTIARY SUPPORT THAT I DO INDEED HAVE AN ORDER FOR PRESCRIBED ORTHOPEDIC BOOTS IS PROVIDED IN MY MEDICAL RECORDS WITH THE NAME OF THE PODIATRIST WHO EXAMINED MY FEET AND ANKLES, MEASURED MY FEET, ORDERED THE ORTHOPEDIC BOOTS, AND THE DATE OF THE DAY I ACQUIRED MY BOOTS. DEFENDANT BERRIER IS COMPLICIT WITH DEFENDANT MAK SIN IN RACIALLY DISCRIMINATING AGAINST ME IN DENYING ME JOB OPPORTUNITIES IN DIETARY AND JANITOR JOBS BY ALLOWING A WHITE AMPLTEE INMATE TO WORK IN DIETARY WEARING A PROSTHETIC LEG WHILE DENYING ME BECAUSE I WEAR ELASTIC KNEE SLEEVES, THIS ACT OF BIGOTRY VIOLATES MY RIGHT TO EQUAL TREATMENT.

#19 ALICE MAK SIN, NURSE PRACTITIONER SURREPTITIOUSLY PENS AN ENTRY INTO MY MEDICAL RECORDS THAT DENIES ME EMPLOYMENT IN DIETARY AND JANITOR JOBS IN RETALIATION FOR EXERCISING MY RIGHTS TO FREE SPEECH INVOLVING FILING GRIEVANCES AND LAWSUITS. IN AN ACT OF BIGOTRY COMMITTED AGAINST ME

BY DEFENDANT MAKIN, SHE ALLOWS A WHITE INMATE AMPUTEE, JOSH GARTLAND, TO WORK IN DIETARY WEARING A PROSTHETIC LEG WHILE DENYING/RESTRICTING ME FROM WORKING IN DIETARY BECAUSE I WEAR KNEE SLEEVES. (EXH.#11 AND 12 GRIEVANCES 585166 AND 585891).

#<sup>20</sup> DEFENDANT DORINA VARNER, CHIEF GRIEVANCE OFFICER HAS SYSTEMATICALLY DENIED ALL GRIEVANCES PERTAINING TO DETAILED INCIDENTS OF MISTREATMENT, BIGOTRY, AND DENIAL OF DUE PROCESS. DEFENDANT VARNER DELIBERATELY IGNORES DOCUMENTED EVIDENCE PRESENTED TO HER IN SUPPORT OF MY COMPLAINTS OF CONSTITUTIONAL RIGHTS VIOLATIONS, E.G. EXH.#1 GRIEVANCE 557320 - A CHECK OF THE HOUSING COUNT RECORDS AND OCCUPANCY DATA WOULD REFLECT THAT CONTRARY TO THE MENDACITY NO OTHER OPEN CELLS WERE AVAILABLE, MY CLAIM THAT TWO CELLS WERE VACANT WAS VERITABLE. EXH.#2 GRIEVANCE 557689 - VIDEO SURVEILLANCE REVEALS THAT NO TWO OFFICERS AS PROTOCOL AND PROCEDURE DICTATES, CAME TO MY CELL TO ESCORT ME TO MY HEARING AND THE FACT THAT I RELATED TO A SERGEANT, DEPUTY SUPERINTENDENT, AND A COUNSELOR THAT I INTENDED TO ATTEND MY HEARING IS IGNORED. EXH.#5 GRIEVANCE 561936 DEFENDANT VARNER DELIBERATELY IGNORES THE GENUINE EVIDENCE THAT MY MEDICAL RECORDS PROVIDE THAT I HAVE PRESCRIBED ORTHOPEDIC BOOTS AND SHE SUPPORTS THE MENDACITY THAT "CONTACT WITH THE MEDICAL DEPARTMENT FOUND THAT YOU DID NOT HAVE AN ORDER FOR ORTHOPEDIC BOOTS." EXH.#11 AND 12 DEFENDANT VARNER ARBITRARILY AND CAPRICIOUSLY DENIES THESE TWO COMPLAINTS OF RACIAL DISCRIMINATION AND BIGOTRY SUPPORTING THE FICTITIOUS CLAIMS OF LINTIME- LY FILING, IGNORING THE EVIDENCE. IN FACT DEFENDANT VARNER DENIES AND SUPPORTS THE REJECTIONS OF GRIEVANCES DETAILING USURPATION OF LEGAL DOCUMENTS, BENT BEDFRAMES, DAMAGING/DESTRUCTION OF PROPERTY, AND HINDERING PROSECUTING AN ACTIVE CIVIL CASE (CV-15-039) KNOWINGLY TO VIOLATE MY

MY CONSTITUTIONAL RIGHTS.

#21 DEFENDANT TREVOR WINGARD IN RETALIATION FOR MY FILING OF GRIEVANCES, AND LAWSUIT (CV-15-039) AGAINST HIM (SUPERINTENDENT SCI SOMERSET) TRANSFERRED ME ON 17 MARCH 2015 BACK TO SCI FAYETTE, KNOWINGLY SENDING ME TO THE FACILITY I WAS TRANSFERRED FROM DECEMBER 2005 FOR PROBLEMS WITH STAFF INVOLVING COMPLAINTS AND LAWSUIT.

#22 DEFENDANT WADSWORTH, MAJOR ON MARCH 6 2015 INFORMED ME THAT I WAS BEING TRANSFERRED BACK TO SCI FAYETTE. I INFORMED DEFENDANT THAT I HAD PROBLEMS WITH THE STAFF AT SCI FAYETTE WHICH PRECIPITATED THE DECEMBER 2005 AND ASKED HIM WHY WAS I BEING SENT BACK TO SCI FAYETTE RESPONDED: QUOTE "YOU'LL FIND OUT WHEN YOU GET THERE." END QUOTE. DEFENDANT WADSWORTH WAS INSTRUMENTAL IN THE RETALIATORY TRANSFER.

DEFENDANTS

EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS/HER OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

LEGAL CLAIMS

THE DEFENDANTS, INDIVIDUALLY AND IN COMPLICITY WITH OTHER NAMED AND UNNAMED DEFENDANTS VIOLATED MY CONSTITUTIONAL RIGHTS PROTECTED UNDER THE FIRST, FOURTH, FIFTH, EIGHTH, AND FOURTEENTH AMENDMENTS TO U.S. CONSTITUTION.

VERIFICATION

I CERTIFY UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE.

DATE 9 NOVEMBER 2015 s/ William Harris, PRO SE CX7039

SCI FAYETTE

(C)

COMPOSITION OF EXHAUSTED ADMINISTRATIVE REMEDIES  
CONSTITUTING CLAIMS OF RETALIATORY CAMPAIGN OF HARASS-  
MENT.

- EXH.#1 GRIEVANCE 557320 BENT BEDFRAME (2 PAGES)
- EXH.#2 GRIEVANCE 557689 DENIAL OF RIGHT TO ATTEND HEARING (2 PAGES)
- EXH.#3 GRIEVANCE 557914 BENT BEDFRAME (2 PAGES)
- EXH.#4 GRIEVANCE 557471 USURPATION OF DOCUMENTS, HINDERING PROSECUTION (2 PAGES)
- EXH.#5 GRIEVANCE 561936 USURPATION OF MEDICALLY PRESCRIBED BOOTS (2 PAGES)
- EXH.#6 GRIEVANCE 562179 DAMAGING AND DESTRUCTION PERSONAL PROPERTY (2 PAGES)
- EXH.#7 GRIEVANCE 564053 USURPATION OF LEGAL DOCUMENTS AND PERSONAL PROPERTY  
(2 PAGES)
- EXH.#8 GRIEVANCE 566543 MISSING PROPERTY DOCUMENT (2 PAGES)
- EXH.#9 GRIEVANCE 576015 MISSING PROPERTY DOCUMENT (2 PAGES)
- EXH.#10 GRIEVANCE 582794 RETALIATION/EQUAL TREATMENT (2 PAGES)
- EXH.#11 GRIEVANCE 585166 BIGOTRY, RACIAL DISCRIMINATION (2 PAGES)
- EXH.#12 GRIEVANCE 585891 RACIAL DISCRIMINATION AND OFFICIAL OPPRESSION.  
(2 PAGES)
- EXH.#13 GRIEVANCE 576172 REFILED GRIEVANCE OF ORIGINALLY FILED GRIE-  
VANCE THAT GRIEVANCE COORDINATOR MENDACIOUSLY CLAIMED WAS NE-  
VER RECEIVED (2 PAGES)
- EXH.#14 UPON TRANSFER TO SCI FAYETTE - PLACEMENT IN ADMIN. CUSTODY
- EXHS.#15 TO #20 DOCUMENTS OF FALSE MISCONDUCT, CONFISCATION OF  
PROPERTY ITEMS, AND WAIVER OF DISCIPLINARY PROCEEDINGS FORM.